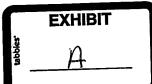
## 0914RWSF.txt

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1	UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI
2	EASTERN DIVISION
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4	•
5	RITA C. WORCH, ) JOSEPH A. WORCH, )
6	PLAINTIFFS, CASE NO. 4:05CV1884-HEA
7	1 57211121121
8	WOLPOFF & ABRAMSON, LLP,
9	KEVIN S. GRILLION, and () KELLERMAN INVESTIGATIONS, ()
10	VS.  WOLPOFF & ABRAMSON, LLP, KEVIN S. GRILLION, and KELLERMAN INVESTIGATIONS, LTD., DEFENDANTS.  JURY TRIAL DEMANDED )  DEMANDED )  DEMANDED )
11	
12	
13	DEPOSITION OF RITA C. WORCH TAKEN BY MICHAEL J. PAYNE, ESQ.
14	ON BEHALF OF THE DEFENDANTS SEPTEMBER 14, 2006
15	<b>32.</b> / <b>2</b> .22. 2. /
16	
17	REPORTED BY SUSAN M. FIALA CERTIFIED COURT REPORTER
18	REGISTERED PROFESSIONAL REPORTER
19	
20	
21	ATKINSON-BAKER COURT REPORTERS 500 N. BRAND BLVD., THIRD FLOOR
22	GLENDALE, CALIFORNIA 91203 (800) 288-3376
23	
24	
25	



15	0914RWSF.txt you have any reason to dispute it?
16	A. I don't know what the number was.
17	Q. You don't know?
18	A. I'm sorry. I don't know.
19	Q. Okay. Are you aware that at some point you
20	became delinquent on your MBNA America bank card?
21	A. Yes.
22	Q. And you acknowledge that you owed and I'm
23	not talking about specific amounts right now, but
24	that you owed a debt as a result of your use of the
25	MBNA America bank card?
	9
1	A. Yes.
2	Q. Okay. Are you aware that an arbitration
3	award has been entered?
4	A. Yes.
5	Q. Have you done anything to dispute the
6	arbitration award?
7	A. No, I didn't.
8	Q. Have you first of all, before today have
9	you ever heard of Wolpoff and Abramson, LLP?
10	A. Yes.
11	Q. When was the first time you heard of them?
12	A. Back in November of 2004.
13	Q. And how did you first hear of them?
14	A. The very first time I heard of them was a
15	phone call that I received.
16	Q. Did how do you know that the individual
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## 0914RWSF.txt

14	A. NO.
15	Q. At any point in this correspondence do you
16	request a verification of the debt or the account?
17	A. Well, I told them I disputed it because
18	there was a lot of interest and fees. You know,
19	because they were starting to add on a lot of excess
20	fees.
21	Q. But I think what I'm getting at is at any
22	point in this correspondence do you ask for a
23	verification of the debt or the account?
24	A. I guess I thought I was in what I said, but
25	I mean, I don't actually come out and say it.
	2
	2
•	
1	Q. So that's not incor embodied in this
2	correspondence; a request for verification?
3	A. Not in so many words, no.
4	Q. Okay. In any words is there a request for a
5	verification in this letter?
6	A. well, I'm telling them I dispute the amount.
7	I guess in my mind that was but no, I don't
8	actually come out and say prove the debt.
9	Q. Okay. Did you ever send any other
10	correspondence to Wolpoff and Abramson?
11	A. Did I ever send any other correspondence? I
12	don't think I did, no.
13	Q. Okay.
14	A. I don't remember sending them anything from

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myself, no.